

JUDGE HOLWELL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

08 CIV 49627

-----X  
PRIME NAVIGATION CO. LTD.,

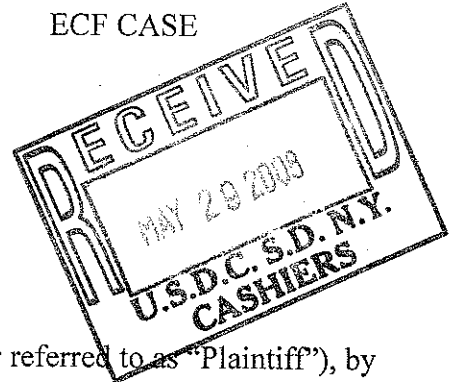
Plaintiff,

- against -

GLOBAL UNITED LTD.,

Defendant.  
-----X

ECF CASE



**VERIFIED COMPLAINT**

Plaintiff, PRIME NAVIGATION CO. LTD. (hereinafter referred to as "Plaintiff"), by and through its attorneys, Lennon, Murphy & Lennon, LLC, as and for its Verified Complaint against the Defendant, GLOBAL UNITED LTD. (hereinafter referred to as "Defendant"), alleges, upon information and belief, as follows:

1. This is an admiralty and maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure and 28 United States Code § 1333.
2. At all times material to this action, Plaintiff was, and still is, a foreign corporation, or other business entity, organized under, and existing by virtue of foreign law and was at all material times the owner of the motor tanker "AMAZON EXPLORER" (hereinafter the "Vessel").
3. Upon information and belief, Defendant was, and still is, a foreign corporation, or other business entity, organized under, and existing by virtue of foreign law, and was at all material times the appointed agent of Plaintiff.
4. By a charter party dated September 14, 2007 Plaintiff voyage chartered the Vessel to nonparty Petrobras.

5. Plaintiff delivered the Vessel into the service of Petrobras and fully performed all duties and obligations under the charter party.

6. On or about February 29, 2008, Defendant Global United Ltd. was appointed and agreed to serve as agent for Plaintiff at Freeport, Bahamas. *A copy of correspondence confirming Plaintiff's appointment of Defendant is annexed hereto as Exhibit "1".*

7. A dispute arose between the parties regarding Defendant's failure to refund cash to master payments which are due and owing to Plaintiff under the Plaintiff's agency agreement with the Defendant.<sup>1</sup>

8. As a result of Defendant's breach of its agency agreement with the Plaintiff due to Defendant's failure to pay the refund of cash to master payments due and owing to Plaintiff, Plaintiff has sustained damages in the total principal amount of \$40,751.46 exclusive of interest, litigation and/or arbitration costs and attorneys' fees.

9. Despite due and repeated demand, Defendant has failed to pay the amounts due and owing under the agency agreement. *A copy of Defendant's confirmation of receipt of funds and Plaintiff's demands for payment are annexed hereto as Exhibit "2".*

10. Plaintiff reserves its right to arbitrate or litigate its claim against Defendant before a properly constituted arbitral body or a court of competent jurisdiction.

11. This action is brought in order to obtain jurisdiction over Defendant and also to obtain security for Plaintiff's claims and in aid of such proceedings.

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<sup>1</sup> Cash to master payments were made to the Defendant by the Plaintiff and were never paid by the Defendant to the master. *See Exhibit "2".*

12. Interest, costs and attorneys' fees are routinely awarded to the prevailing party in such proceedings. As best as can now be estimated, Plaintiff expects to recover the following amounts:

A.	Principal claim – Cash to Master Payments	\$40,751.46
B.	Estimated interest on claim - 3 years at 7.5% compounded quarterly:	\$10,176.31
C.	Estimated attorneys' fees and litigation costs:	\$30,000.00
	<b>Total:</b>	<b>\$80,927.77</b>

13. The Defendant cannot be found within this District within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, but, upon information and belief, Defendant has, or will have during the pendency of this action, assets within this District and subject to the jurisdiction of this Court, held in the hands of garnishees within the District which are believed to be due and owing to the Defendant.

14. The Plaintiff seeks an order from this Court directing the Clerk of Court to issue Process of Maritime Attachment and Garnishment pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims, attaching, *inter alia*, any assets of the Defendant held by any garnishees within the District for the purpose of obtaining personal jurisdiction over the Defendant and to secure the Plaintiff's claim as described above.

**WHEREFORE**, Plaintiff prays:

A. That process in due form of law issue against the Defendant, citing it to appear and answer under oath all and singular the matters alleged in the Complaint failing which default judgment be entered against it;

B. That since the Defendant cannot be found within this District pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims, this Court issue an Order directing the Clerk of Court to issue Process of Maritime Attachment and Garnishment pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims, attaching all goods, chattels, credits, letters of credit, bills of lading, effects, debts and monies, tangible or intangible, or any other funds up to the amount of **\$80,927.77** belonging to, due or being transferred to, from, or for the benefit of the Defendant, including but not limited to such property as may be held, received or transferred in Defendant's name or as may be held, received or transferred for its benefit at, moving through, or within the possession, custody or control of banking/financial institutions and/or other institutions or such other garnishees to be named, and that all persons claiming any interest in the same be cited to appear and pursuant to Supplemental Admiralty Rule B answer the matters alleged in the Complaint;

C. That process in due form of law issue against the Defendants, citing them to appear and answer under oath all and singular the matters alleged in the Complaint;

D. That pursuant to 9 U.S.C. §§ 201 *et. seq.* and/or the principles of comity, this Court recognize and confirm any judgment rendered on the claims had herein as a Judgment of this Court;

E. In the alternative, that the Court retain jurisdiction to compel the Defendant(s) to arbitrate in accordance with the United States Arbitration Act, 9 U.S.C. § 1 *et seq.*;

F. That this Court recognize and confirm any award or judgment rendered on the claims had herein as a Judgment of this Court;

G. That this Court retain jurisdiction over this matter through the entry of any judgment or award associated with any of the claims currently pending, or which may be initiated in the future, including any appeals thereof;

H. That this Court award Plaintiff the attorneys' fees and costs incurred in this action; and

I. That the Plaintiff has such other, further and different relief as the Court may deem just and proper.

Dated: New York, NY  
May 29, 2008

The Plaintiff,  
PRIME NAVIGATION CO. LTD


By: 

Patrick F. Lennon  
Coleen A. McEvoy  
LENNON, MURPHY & LENNON, LLC  
420 Lexington Avenue, Suite 300  
New York, NY 10170  
(212) 490-6050 - phone  
(212) 490-6070 - facsimile  
[pfl@lenmur.com](mailto:pfl@lenmur.com)  
[cam@lenmur.com](mailto:cam@lenmur.com)

**ATTORNEY'S VERIFICATION**

1. My name is Patrick F. Lennon.
2. I am over 18 years of age, of sound mind, capable of making this Verification, and fully competent to testify to all matters stated herein.
3. I am an attorney in the firm of Lennon, Murphy & Lennon, LLC attorneys for the Plaintiff.
4. I have read the foregoing Verified Complaint and know the contents thereof and believe the same to be true and accurate to the best of my knowledge, information and belief.
5. The reason why this Verification is being made by the deponent and not by the Plaintiff is that the Plaintiff is a business organization with no officers or directors now within this District.
6. The source of my knowledge and the grounds for my belief are the statements made, and the documents and information received from, the Plaintiff and agents and/or representatives of the Plaintiff.
7. I am authorized to make this Verification on behalf of the Plaintiff.

Dated: New York, NY  
May 29, 2008

  
\_\_\_\_\_  
Patrick F. Lennon

# EXHIBIT 1

From: Moroccan Brokers Inc  
<A2@MARBI>  
To : MASTER AMAZON EXPLORER Sent 2/29/2008 10:09 PM  
<amazonexplorer@sunenterprises.gr@SMT>  
Cc : SUN ENTERPRISES LTD - POSTOFFICE Sent 2/29/2008 10:12 PM  
To : S.SAPOUNTZOGLOU Sent 3/3/2008 9:16 AM  
To : G.TZORBATZAKIS Sent 3/3/2008 8:53 AM  
To : I.ALOUPIS Sent 3/3/2008 4:12 PM  
To : T.MAKRYNIOTIS Sent 3/3/2008 9:46 AM  
To : SUNSEL Sent 3/11/2008 11:43 AM  
To : P.Cook Sent 3/3/2008 10:10 AM  
To : J.ATHANASOPOULOS Sent 3/1/2008 9:23 AM  
To : G.POLEMIS Sent 3/3/2008 10:55 AM  
To : A.Zarafonitis Sent 3/3/2008 9:14 AM  
To : C.SALFARIS Sent 3/3/2008 9:20 AM  
To : F.KONTOS Sent 3/2/2008 8:56 PM  
To : V.PEPONIS Sent 3/1/2008 9:23 PM  
To : AAS - A.SPIRANTIS - AT OFFICE Sent 3/3/2008 10:09 AM  
To : D.Baha Sent 3/3/2008 9:22 AM  
To : M.PAPAPETROU Sent 3/3/2008 9:38 AM  
To : D. Mikolis Sent 3/3/2008 11:49 AM  
To : Clive J. Redhead Pending 3/1/2008 9:16 AM  
Date: Friday, February 29, 2008 10:09 PM Msg: MARBI-261039  
Sub : MT AMAZON EXPLORER C/P JAN 22, 2008 - SANTOS/RJANEIRO/FREEPORT-BAHAMAS - F

Subject: MT AMAZON EXPLORER C/P JAN 22, 2008 - SANTOS/RJANEIRO/FREEPORT-BAHAMAS - FULL VOY INSTRUCTIONS

REF.: MT AMAZON EXPLORER C/P JAN 22, 2008 - FULL VOY INSTRUCTIONS

FOLLOWING RECEIVED FROM CHARTERERS - CONFIRM

QUOTE

GOOD DAY SIRs,

PLS FWD TO OWNERS/MASTER.

1 ST LOADING PORT - SANTOS

QTTY : 50.000 MT OF FUEL OIL SG - 1,02 SEGREGATED BY DOUBLE VALVE.

2 ND LOADING PORT - RIO DE JANEIRO

QTTY : 21.000 MT OF FUEL OIL SG - 1

UPON COMPLETION OF LOADING VSL SHALL PROCEED TO FREEPORT/BAHAMAS FOR ORDERS.  
HOWEVER VSL WILL BE INFORM NOA TO NVMC / USCG (sans@nvmc.uscg.gov),  
INITIALLY BASIS GUAYANILLA, 96 H TO ARRIVAL.

VESSEL TO MAINTAIN LOAD TEMPERATURE BUT MAXIMUM 135 DEG FAH. MAX LOAD TEMP  
160 DEG FAH AT VESSELS MANIFOLD. OWNERS SHOULD SEND TO CHARTERERS ALL  
DOCUMENTS ONLY SIGNED BY VESSEL AND TERMINAL REPRESENTATIVES REPORTING THE  
TEMPERATURE OF LOADED CARGO.

REGARDING AGENTS TO BE APPOINTED AT FREEPORT, BAHAMAS, WE SUGGEST BELOW,  
WHICH KINDLY CONFIRM OWNERS' APPOINTMENT

FREEPORT/BAHAMAS



GLOBAL UNITED BAHAMAS

phone Number : + 242 352-9315 (6, 7, 8) (Switchboard) / + 242 351-7374  
(Direct) / + 242 352-2328 (AOH)  
Fax.: + 242 352-2754 / + 242 352-4034 / + 242 352-2329 / + 242 351-6784  
E-Mail : gulops@gulbahamas.com

REMARK: FOR NOA PURPOSE FOLLOW FULL STYLE OF AGENT AT GUAYANILLA:

Agency Name : LUIZ A. AYALA COLON SUCRES. INC.  
Address : 3091, Ave. Santiago de Los Caballeros P.O.Box : 7066 - PR  
00732-7066  
Country : PUERTO RICO - USA  
Telephone Number : +1 787 848 9000, Ext. 2401 to 2405 and 041-1120  
Fax.: + 1 787 848 0070  
TLX : 6502152635 AND 6502152636  
E-Mail : agency.mgr.sj@ayacol.com

Contacts :

Name : FRANCISCO AYALA (AGENT)  
Tel.: + 1 787 984 5705  
Mobile: 1 787 504 2794  
E-mail: agency.mgr.sj@ayacol.com

Name : LUIZ G. DE JESUS (MANAGER)  
Tel.: + 1 787 843 4517  
Mobile: 1 787 599 8134  
E-mail: agency.mgr.sj@ayacol.com

'EDP' CAN BE APPLIED IN CASE B/L NOT RELEASED TILL VSL'S SLNG

AS SOON AS VSL LEAVES LAST LOADING PORT PLS INFORM THE FOLLOWING:

AA) QUANTITY LOADED AS PER B/L (IF AVAILABLE), SHIP'S FIGURES AND THE  
TEMPERATURE OF LOADED CARGO.

BE) ARRIVAL DRAFT (SW/BW/FW) AND ETA DAILY AT FREEPORT/BAHAMAS, ST EUSTATIUS,  
GUAYANILLA/PTO RICO AND N.YORK

CC) DATE AND HOUR OF DEVIATION POINT TO ST EUSTATIUS, GUAYANILLA AND NYORK

DD) TEMPERATURE OF CARGO PER EACH TANK DAILY

EE) QTTY (IN MTONS) THAT VSL HAS TO LIGHTER IN ORDER TO REACH THE FOLL  
DRAFTS 38FT/37FT AND 36FT (SW/BW/FW)

FF) H2S CONTENT

ALSO, PLS INSTRUCT MASTER TO START ETA NOTICE TO DISPORT AGENTS, TO  
PETROBRAS AMERICA AND TO US IN ORDER TO AVOID ANY DELAYS AT DISCH OPERATIONS  
NOTE BELOW EMAILS TO BE SENT

FREEPORT BAHAMAS AGENCY  
E-Mail : gulops@gulbahamas.com

PETROBRAS AMERICA  
EMAIL - bgoulart@petrobras-usa.com

SPECIAL REMARK TO ALL CONCERNED PARTIES: PLS KEEP ALL MSGS IN COPY TO  
(lmcercqueira.nope@petrobras.com.br); (mandre@petrobras.com.br) AND FOR OUR

GENERAL EMAIL: tankers@petrobras.com.br

KINDLY CONFIRM MASTER IS INSTRUCTED ACCORDINGLY.

BRGDS,

Marcos André

AB-LO/TM/OC

Phone: 55 21 3224-6425 or 6460 or 6404

Fax: + 55 21 25178005 after the message dial ext. 146425 (preferential -  
straight to my computer) or 55 21 3224-6454 or 6455 or 6456

Email: mandre@petrobras.com.br

UNQUOTE

NNNN

# EXHIBIT 2

ATHOFF/SS @ 12/05/2008 1:13 PM L:ATHOFF-1405082 B 001/004

From: Sun Enterprises Ltd - SS

To : Ellie Hepburn Sent 17/04/2008 3:20 PM  
 <ehepburn@gulbahamas.com@SMT>

Cc : Fred Hall Sent 17/04/2008 3:20 PM  
 <fhall@gulbahamas.com@SMT>

Cc : AAS - A.SPYRANTIS - AT OFFICE Sent 17/04/2008 2:09 PM

Cc : P.KONTOS Sent 17/04/2008 4:04 PM

Cc : I.ALOUPIS Sent 18/04/2008 11:31 AM

Cc : M.FRAGIAS Sent 18/04/2008 9:37 AM

Cc : T.MAKRYNIOTIS Sent 17/04/2008 3:21 PM

Cc : V.PEPONIS Sent 17/04/2008 11:01 PM

Cc : N. Mikromastoras Sent 17/04/2008 3:25 PM

Cc : N.Mavroudi Sent 18/04/2008 11:52 AM

Cc : A.Amourgianos Sent 05/05/2008 10:31 AM

Cc : P.Cook Sent 17/04/2008 1:31 PM

Date: 17 April, 2008 3:20 PM Msg: ATHOFF-1405082

Sub : Re: AMAZON EXPLORER PORT CTM

Good day,

Further your below please note that almost 1 month has passed and Owners have not received funds with great disappointment. They are requesting funds to be returned to them immediately without any further delay.

Please urgently advise when funds will be returned

Regards  
 Stavros Sapountzoglou

-----

From: Ellie Hepburn

Date: Thu, 3 Apr 2008 17:33 +0300 Msg: ATHOFF-1394303

Subject: RE: AMAZON EXPLORER PORT CTM

To: Sun Enterprises Ltd - SS

To: Fred Hall

Good Day Stavros,

Below well revd, please be advised that we are working diligently with Central Bank to grant approval to have these funds sent back to owners. This is sometimes a swift process but can also be a lengthy process. I can guarantee you that as soon as approval is granted funds will be reimbursed to owners.

Thanks for your patience and understanding,

Best Regards,  
 Mr.Ellie Hepburn/Manager Tanker Operations  
 GUL Tanker Division(G.T.D)  
 3rd Floor Global United House  
 Freeport Harbour Area, Queens Hwy  
 P.O.Box F-43259, Freeport Bahamas  
 Tel:(242)-352-9315 Ext 230  
 Direct Line:1-242-351-4207  
 Fax:(242)-352-4034  
 Cell:(242)-442-8209  
 ACH:(242)-374-4916  
 I.T Phone:1-786-619-3843  
 website:www.gulbahamas.com  
 VHF: 09(Global United Ltd) / Ch:12(Borco Marine) / Ch:13(Borco Pilots)

"Global in our service,United in our customer care!!!!!!"

ATHOFF/SS

12/05/2008 1:13 PM [E]ATHOFF-1405082

002/004

From: Sun Enterprises Ltd - SS (mailto:Email@SunEnterprises.gr)  
Sent: Thu 4/3/2008 7:25 AM  
To: Fred Hall  
Cc: Ellie Hepburn  
Subject: AMAZON EXPLORER PORT CTM

OWNERS JUST ADVISED THAT FUNDS STILL HAVE NOT BEEN RETURNED TO THEIR  
BANK. YOU  
ARE KINDLY REQUESTED TO ADVISE IMMEDIATELY WHEN FUNDS FOR CTM WERE  
RETURNED AND  
ALSO TO ADVISE REMITTANCE DETAILS IN ORDER TO TRACE.

REGARDS  
STAVROS SAPOUNTZOGLOU  
ACCOUNTS DEPT

-----  
From: Sun Enterprises Ltd - SS  
Date: Mon, 31 Mar 2008 11:03 +0300 Msg: ATHOFF-1390551  
Subject: Re: AMAZON EXPLORER PORT EXPS & CTM  
To: GULF BAHAMAS Ellie Hepburn  
Cc: GULF BAHAMAS Fred Hall  
Cc: GULF BAHAMAS

PLS ADVISE WHEN FUNDS REMITTED TO OWNERS AS PER BELOW INSTRUCTIONS

REGARDS  
STAVROS SAPOUNTZOGLOU  
ACCOUNTS DEPT

-----  
From: Sun Enterprises Ltd - SS  
Date: Mon, 24 Mar 2008 16:04 +0200 Msg: ATHOFF-1386244  
Subject: Re: AMAZON EXPLORER PORT EXPS & CTM  
To: Fred Hall  
Cc: AMAZON EXPLORER  
Cc: gulprof  
Cc: Ellie Hepburn  
Cc: Wires

AS PER YOUR BELOW MESSAGE OF 13 MARCH 2008 YOU CONFIRMED THAT FUNDS FOR  
PORT  
EXPS & CTM WERE RECEIVED. WHY IS IT THAT THE VESSEL HAS SAILED TODAY 21  
MARCH  
AND DID NOT RECEIVE THE FUNDS. MASTER ADVISED THAT EACH DAY YOU WERE  
PROMISING  
HIM TO DELIVER FUNDS BUT HE NEVER RECEIVED THEM. THIS IS VERY  
DISAPPOINTING  
BECAUSE IT IS THE SECOND TIME THAT HAS HAPPENED WITH YOUR AGENCY.

PLS IMMEDIATELY RETURN FUNDS \$ 45,668 AS FOLLOWS

TO: CITIBANK (SWITZERLAND) ZURICH  
SWIFT CODE: CBSWCH33

ATHOFF/SS      12/05/2008 1:13 PM      [E]ATHOFF-1405082      003/004  
FOR ONWARD TRANSMISSION TO:      CITIBANK (SWITZERLAND)  
   GENEVA BRANCH  
   16 QUAI GENERAL GUISAN  
   GENEVA, SWITZERLAND  
ATTENTION:      MRS JOSEFINA MACEIRA  
  
CORRESPONDING BANK IN N.Y.:      CITIBANK N.A. NEW YORK  
   A/C NO 1 0 9 9 9 8 2 3  
   (OF CITIBANK (SWITZERLAND) ZURICH)  
   ABA NO: 0 2 1 0 0 0 0 8 9  
   SWIFT CODE: C I T I U S 3 3  
  
IN FAVOUR:      PRIME NAVIGATION CO. LTD  
A/C NO:      0 / 3 4 8 7 8 1 / 0 1 4  
  
IBAN NUMBER:      CH73 0861 8000 3487 8101 4

REGARDS  
STAVROS SASPOUNTZOGLOU  
-----

From: Fred Hall  
Date: Wed, 12 Mar 2008 22:53 +0200 Msg: ATHOFF-1379629  
Subject: RE: AMAZON EXPLORER PORT EXPS & CTM  
To: Sun Enterprises Ltd - SS  
Cc: AMAZON EXPLORER  
Cc: gulprof  
Cc: Ellie Hepburn  
Cc: Wires

We confirm receipt of funds

Best regards,  
Frederick Hall  
Global United Ltd  
As agents only  
Queen's Hwy & Harbour Rd.  
Freeport, Grand Bahama  
Bahamas  
Tel: 242-352-9315 ext 224  
Direct: 242-351-6115  
Fax: 242-352-4034  
Group email: gulops@gulbahamas.com  
or dry dock calls: dry-dock@gulbahamas.com

"Global in our service United in our customer care"

This e-mail (including all attachments) is confidential and may be privileged. It may be read, copied and used only by the intended recipients, and must not be re-transmitted in any form without our consent. If you have received it in error, please contact us immediately by return e-mail. Please then delete it and do not disclose its contents to any other person(s).

-----Original Message-----

From: Sun Enterprises Ltd - SS [mailto:Email@Sunenterprises.gr]  
Sent: Wednesday, March 12, 2008 3:30 AM  
To: Ellie Hepburn  
Cc: AMAZON EXPLORER; gulprof  
Subject: AMAZON EXPLORER PORT EXPS & CTM

ATHOFF/BS

12/05/2008 1:13 PM

ATHOFF-1405082

004/004

Good morning,

Further our message of 7/3/08 pls note that we have remitted the total of \$

74,668 covering P/exps \$29000 + CTM \$ 45,668 with value 11/3/08 through Citibank-

Geneva. Attached herewith are Citibank's swift payment details for funds, pls

confirm safe receipt.

Herebelow are our billing and mailing instructions for your D/A:

PRIME NAVIGATION CO. LTD.

MONROVIA, LIBERIA

M/T AMAZON EXPLORER

c/c SUN ENTERPRISES LTD.

LIYANOS BUILDING

5th FLOOR

47 - 49 AKTI MIAOULI

185 36 PIREAUS, GREECE

Best Regards

Stavros Sapountzoglou

amazon explorer  
ATHOFF Wed, 12 Mar 2008 09:22  
From: Sun Enterprises LTD  
To : GLOBAL UNITED BAHAMAS Sent  
07/03/2008 3:16 PM  
<ehpburn@gulbahamas.com@SMT>  
Cc : AMAZON EXPLORER Sent  
07/03/2008 3:17 PM  
<@EXPLOR>  
Date: 07 March, 2008 3:16 PM Msg: ATHOFF-1375231  
Path: \Everyone\A-OUTGOING\Mar-2008  
Sub : REF MT AMAZON EXPLORER

PIRAEUS 7.3.08

TO GLOBAL UNITED BAHAMAS  
CC MASTER

PEF MT AMAZON EXPLORER ETA FREEPORT 15.3.08

===

PLEASE ADVANCE CASH TO MASTER THE FOLLOWING AMOUNTS  
OBTAINING SEPARATE RECEIPTS

AAA

IN US. CURRENCY REPEAT IN US CURRENCY THE FULL AMOUNT



amazon explorer

OF USDOLLARS FIVE THOUSAND SIX HUNDRED SIXTY EIGHT ( 5,668)

DEBITING OWNERS IN YOUR D/A WITH ANY BANK CHARGES/ DIFFERENCE

OF EXCHANGE WRITING ON MASTERS RECEIPT SAID AMOUNT EQUALS TO

EUROS THREE THOUSANDSEVEN HUNDRED ( 3,700)

BBB

ALSO IN US. CURRENCY THE FULL AMOUNT OF USDOLLARS FOURTY THOUSAND ( 40,000) FOR FOREIGN CREW DEBITING OWNERS WITH BANK CHARGES

ABOVE FUNDS WILL BE REMITTED TOGETHER WITH FUNDS FOR PORT EXPS ( USD 29.000) TTLG USD 74,668 THROUGH CITIBANK -GENEVA

REGARDS

NNNNNNNNNNNNNNNNNNNNNNNNNNNNNNNN